

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)	
)	
v.)	
)	
JOSEPH CARAMADRE)	Criminal No. 11-186-S
)	
and)	
)	
RAYMOUR RADHAKRISHNAN)	
Defendants)	

**DEFENDANT JOSEPH CARAMADRE'S MOTION IN LIMINE TO PRECLUDE
THE TESTIMONY OF ANDREW KALOTAY OR IN THE ALTERNATIVE
TO HOLD A DAUBERT HEARING**

The defendant Joseph Caramadre hereby moves this Honorable Court for an order in limine precluding the testimony of Andrew Kalotay and the admission into evidence of his report, or in the Alternative to Hold a Daubert¹ Hearing.

In support hereof, Mr. Caramadre relies upon the Memorandum of Law submitted herewith.

Respectfully submitted,
JOSEPH CARAMADRE
By and through his Attorneys,
/s/ Anthony M. Traini
Anthony M. Traini (#4793)
56 Pine Street, Suite 200
Providence, RI 02903-2819
Tel: (401) 621-4700
Fax: (401) 621-5888
Email: amt@trainilaw.com

¹Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579 (1993).

/s/ Michael J. Lepizzera, Jr.
Michael J. Lepizzera, Jr. (#4995)
LEPIZZERA & LAPROCINA, LTD.
117 Metro Center Boulevard, Suite 2001
Warwick, Rhode Island 02886
Tel. (401) 739-7397
Fax (401) 691-3558
Email: mlepizzera@leplap.com

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2012, a copy of the foregoing pleading was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Anthony M. Traini
Anthony M. Traini